

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

GERALD PALMER, JR.,

Plaintiff,

v.

SCRIPPS MEDIA, INC.,

Defendant.

Case No. 24-cv-12353

Hon. Brandy R. McMillion

Magistrate Judge David R. Grand

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**JOINT STATUS REPORT**

Plaintiff Gerald Palmer, Jr. and Defendant Scripps Media, Inc. jointly submit the following status report regarding their negotiations over Plaintiff's Rule 30(b)(6) deposition notice.

The parties report that they have reached a compromise agreement on the appropriate scope of all topics.

As for the depositions:

- Pauline Retty will testify as the 30(b)(6) witness on Topics Nos. 2, 4, and 7 on February 10, 2025, the same day her individual deposition will proceed.
- Donn Bousquet will testify as the 30(b)(6) witness on Topics Nos. 6 and 10. He was noticed for individual deposition on March 7, 2025,

and is available on that date. He will testify on the 30(b)(6) topics on the same date as his individual deposition.

- Katie (Ford) Wilson will testify as the 30(b)(6) witness on Topics Nos. 1, 3, and 11-15. She was noticed for individual deposition on March 19, 2025, and is available on that date. She will testify on the 30(b)(6) topics on the same date as her individual deposition.
- Scripps will identify the deponent for Topics Nos. 5, 8, and 9 next week and Plaintiff will work with Scripps to identify a mutually-available date for the lawyers and the witness for the taking of that deposition.

Respectfully submitted,

CARLA D. AIKENS, P.L.C.

KIENBAUM HARDY VIVIANO  
PELTON & FORREST, PLC

By: /s/ Austen J. Shearouse (by permission)

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Dated: February 7, 2025

By: /s/ Thomas J. Davis

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Dated: February 7, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on February 7, 2025, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

/s/ Thomas J. Davis

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